

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

MICHAEL DOMANN  
AND  
MARY JO DOMANN  
10824 Watercress Road  
Strongsville, Ohio 44149

Case No. \_\_\_\_\_

Judge \_\_\_\_\_

Plaintiffs,

vs.

FRONTIER AIRLINES  
C/O CORPORATION SERVICE  
COMPANY  
3366 Riverside Drive, #103  
Upper Arlington, Ohio 43221

AND

HUNTLEIGH USA CORP.  
5300 Riverside Drive  
Cleveland, Ohio 44135

AND

CITY OF CLEVELAND  
Cleveland Hopkins Airport  
C/O 601 Lakeside Avenue E.  
Cleveland, Ohio 44114

Defendants.

**DECLARATION OF TIMOTHY J. O'CONNELL**

In accordance with 28 U.S.C. § 1746, I hereby declare the following:

1. My name is Timothy J. O'Connell. I am a partner at the law firm of Jaffe Raitt Heuer & Weiss, P.C., which represents Defendant Frontier Airlines, Inc. ("Frontier") in litigation originally filed in the Court of Common Pleas of Cuyahoga County, Ohio, as Case No. CV-22-971208, *Michael Domann, et al. v. Frontier Airlines, Inc., et al.*, which Frontier is removing to the

United States District Court for the Northern District of Ohio, Eastern Division. I am over 18 years of age, of sound mind, and capable of making this declaration.

2. The document attached as Exhibit 1 hereto is a true and correct copy of a two-page excerpt of the Standard Ground Handling Agreement between Frontier and Huntleigh USA Corporation for services at the Cleveland Hopkins International Airport (“CLE”) during the relevant time period.

3. The document attached as Exhibit 2 hereto is a true and correct copy of the Colorado Secretary of State’s summary for Frontier that I downloaded from the Colorado Secretary of State’s website on December 4, 2022.

4. The document attached as Exhibit 3 hereto is a true and correct copy of the results of my business name search for “Huntleigh USA Corporation” on the Missouri Secretary of State website on November 30, 2022.

5. The document attached as Exhibit 4 hereto is a true and correct copy of the “About Huntleigh” webpage that I downloaded from the Huntleigh USA Corporation website at <https://www.huntleighusa.com/about.html> on December 4, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 5th day of December, 2022.

/s/ Timothy J. O’Connell  
Timothy J. O’Connell

# Exhibit 1

## **STANDARD GROUND HANDLING AGREEMENT - SIMPLIFIED PROCEDURE**

### **ANNEX B10.1 – LOCATION(s), AGREED SERVICES AND CHARGES**

to the Standard Ground Handling Agreement (SGHA) of 2013

between: **Frontier Airlines, Inc.**

having its principal office at: 4545 Airport Way  
Denver, CO 80239

and hereinafter referred to as the "Carrier"

and: **Huntleigh USA Corporation**

having its principal office at: 545 E. John Carpenter Freeway, Suite 175  
Irving, TX 75062

and hereinafter referred to as the "Handling Company"

the Carrier and/or the Handling Company may hereinafter be referred to as "the Party(ies)"

effective from January 1, 2019

This Annex B10.1 for

the location(s): Cleveland Hopkins International Airport (the "Airport" and  
"CLE")

is valid from: January 1, 2020

and replaces: B10.0

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#### **PREAMBLE:**

This Annex B is prepared in accordance with the simplified procedure whereby the Parties agree that the terms of the Main Agreement and Annex A of the SGHA of 2013 as published by the International Air Transport Association shall apply to this Annex B as if such terms were repeated here in full. By signing this Annex B, the Parties confirm that they are familiar with the aforementioned Main Agreement and Annex A.

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#### **PARAGRAPH 1. HANDLING SERVICES AND CHARGES**

- 1.1. For a single ground handling consisting of the arrival and subsequent departure at agreed timings of the same aircraft, the Handling Company shall provide the following services of Annex A:

#### **SECTION 2. PASSENGER SERVICES**

- 2.1.3 When requested by the Carrier,  
(a) provide

special equipment and specially trained personnel, for assistance to  
 2. persons with reduced mobility (PRMs) ("Wheelchair Services")

## SECTION 6. SUPPORT SERVICES

### 6.2 Automated/Computer or Manual Recording Systems

#### 6.2.2 Perform the following functions in

(b) Handling Company's system  
 for

(11) Other functions – Wheelchair Services dispatch, tracking, data compilation  
 (request times, response times, move information, compliments, complaints, etc.)

- 1.2. Rates (in USD) for the services defined in sub-paragraph 1.1. of this Annex B are as follows:

2020

USD \$ [REDACTED] per turn

2021+

USD \$ [REDACTED] per turn (Effective January 1<sup>st</sup>, 2021)

### Performance Credits (Effective January 1, 2019)

#### Monthly Performance

		Station Monthly Departures		
		<63	63-212	>212
Wheelchairs	<95% of Planned Pushes w/in 10 mins.	[REDACTED] % off of monthly invoice		
	<97% of Unplanned Pushes w/in 20 mins.	[REDACTED] % off of monthly invoice		
	>30 Minute Unattended or Wait(s)	\$ [REDACTED] per Occurrence		
	Missing Wheelchair Data	\$ [REDACTED]/Day	\$ [REDACTED]/Day	\$ [REDACTED]/Day
Complaint(s)	Verified complaint re service for which the Handling Company can't disprove	\$ [REDACTED] per Occurrence		
Uniforms	Incomplete, dirty, untidy	\$ [REDACTED] per Occurrence or Complaint		

- 1.3. In case of a change in mandated regulations effecting pay rates, hours/scope of operation, or employee benefits, the Handling Company may request a renegotiation of rates upon ninety (90) days' written notice to the Carrier.
- 1.4. No extra charges beyond what is specifically stated above will be made for providing services on legal holidays, weekends, evenings, or at night.
- 1.5. Above indicated rates will be applicable for non-scheduled/diverted flights as well during the term of this Agreement.

## PARAGRAPH 2. ADDITIONAL SERVICES AND CHARGES

- 2.1. All services not included in Paragraph 1 of this Annex that the Carrier requests will be charged at the rate(s) agreed to by the Parties.

# Exhibit 2



Colorado  
Secretary of State  
Jena Griswold

About Secretary Griswold | Español

## Summary

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Business Information  
Business Search

FAQs, Glossary and Information

Details			
	<b>Name</b>	FRONTIER AIRLINES, INC.	
	<b>Status</b>	Good Standing	<b>Formation date</b> 02/08/1994
	<b>ID number</b>	19941015653	<b>Form</b> Corporation
	<b>Periodic report month</b>	February	<b>Jurisdiction</b> Colorado
	<b>Principal office street address</b>	4545 Airport Way, Denver, CO 80239, United States	
	<b>Principal office mailing address</b>	4545 Airport Way, Denver, CO 80239, United States	

Registered Agent	
	<b>Name</b> Corporation Service Company
	<b>Street address</b> 1900 W. Littleton Boulevard, Littleton, CO 80120, United States
	<b>Mailing address</b> 1900 W. Littleton Boulevard, Littleton, CO 80120, United States

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# Exhibit 3



John R. Ashcroft

Missouri Secretary of State

MISSOURI ONLINE BUSINESS FILING

MY ACCOUNT

HOME

SEARCH

MISC INFO

UCC FILING

Help

Gen. Business - For Profit Details as of 11/30/2022

Required Field \*

File Documents - select the filing from the "Filing Type" drop-down list, then click FILE ONLINE.

File Registration Reports - click FILE REGISTRATION REPORT.

Copies or Certificates - click FILE COPIES/CERTIFICATES.

RETURN TO SEARCH RESULTS

Create Filing

Articles of Amendment

FILE ONLINE

ORDER COPIES/CERTIFICATES

General Information

Filings

Principal Office Address

Contact(s)

Name(s)

HUNTLEIGH USA CORPORATION

Principal Office Address

545 E John Carpenter Fwy  
ste 175  
Irving, TX 75062-3931

Type

Gen. Business - For Profit

Charter No.

00361677

Domesticity

Domestic

Home State

MO

Registered Agent

[NATIONAL REGISTERED AGENTS, INC.](#)  
120 South Central Avenue  
Clayton, MO 63105

Status

Good Standing

Date Formed

1/17/1992

Duration

Perpetual

Renewal Month

January

Report Due

4/30/2023

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# Exhibit 4

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[Online Transportation Scheduling at LAS](#)  
[Huntleigh USA Corp Security Client Portal](#)  
[Huntleigh USA V-SaaS Support Ticketing System](#)

For Professional Security Services, please complete our online [security services request form](#).

For general information, we will happily contact you within 2 - 3 business days.

☎ 833.HUNTUSA (833.486.8872)

[Looking for Verification of Employment?](#)



## Huntleigh USA Corporation - About Huntleigh



## Quick facts

### History

Established - 1992

Acquired by ICTS USA Inc. - 1999

Aviation and Related Services - 2000

Video Surveillance as a Solution - 2013

Real Time Operations Center - 2013

Advanced RTOC - 2016

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## Who we are

### About us

Established in 1992, Huntleigh USA Corporation rapidly became a global leader in developing tailored, comprehensive, and effective security solutions for individuals and businesses alike. In 1999,

Huntleigh USA Corporation was acquired by ICTS USA Inc., a subsidiary of ICTS International N.V., which has played a major role in aviation security since 1982.

With its highly skilled and experienced professional staff, supported

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and Aviation Security Solutions and Services to commercial and private companies with varying operational volumes and needs.

This advantage, combined with Huntleigh USA Corporation's nationwide support structure, qualifies it as the low risk, best value choice to meet the demanding requirements of any organization.

Our goal is to enhance the success of our clients and their operations by providing superior security, service and consulting with the highest degree of integrity and responsiveness.

Huntleigh USA Corporation thrives in a culture of trust, equality, teamwork, responsibility, high expectations, dependability and open communication with not only its employees and shareholders, but above all – its customers.

Huntleigh USA Corporation – We know how important security and service are to you.

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### Our mission objectives

- Deliver a professional tailored service to meet our clients' specific needs and objectives.
- Provide our clients with a service that exceeds all expectations.
- Gain the trust and understanding of our clients' current needs and future visions and to provide dedication in pursuing the highest professional standard of security and safety services.



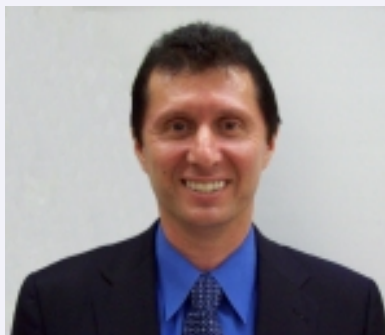
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Looking for a career?

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### Our management team



Richard Sporn



Dennis Fox

#### **Richard Sporn - Chief Executive Officer**

Richard was appointed as the Chief Executive Officer of Huntleigh USA Corporation Corporation, a wholly-owned subsidiary of ICTS International N.V. in 2005. Prior to his appointment, Richard held numerous senior leadership roles at Huntleigh USA Corporation/ICTS during his more than 20 year tenure. Directly prior



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and Training and in that role served as the key Huntleigh USA Corporation individual responsible for client contracts, communications, and overall client satisfaction. Prior to assuming corporate staff responsibilities at Huntleigh USA Corporation, Richard served as Managing Director for ICTS for nine years in Vienna, Austria with full-range operational responsibilities for finance, service delivery, administration, and client satisfaction. Prior to that, Richard served ICTS as an internal Senior Consultant for its operations in Asia, South America, and Europe where he ensured superior service delivery via effective recruiting, selection, training, and auditing programs.

### **Dennis Fox - National Director of Operations**

Dennis joined Huntleigh USA Corporation in 1999 and serves as National Director of Operations for Huntleigh USA Corporation Corporation. Upon assuming his role with Huntleigh USA Corporation Corporation, Dennis brought with him more than ten years combined experience from aviation service companies such as ITS and Andy Frain Services. His responsibilities included aviation regulatory compliance, business development, and overall operations. Dennis is accomplished in business development, client relations, and internal auditing.



545 E. John Carpenter Freeway  
Suite 175  
Irving, TX 75062



info@huntleighusa.com



## Huntleigh USA Corporation - About Huntleigh



214.614.4031



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